



**NORTHEAST COALITION  
OF NEIGHBORHOODS**

**U.S. Environmental Protection Agency**

805 SW Broadway, Suite 500,  
Portland, OR 97205

**RE: Portland Harbor Superfund Site**

**August 31, 2016**

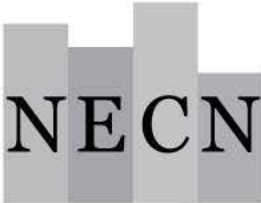
Dear Ms. McCarthy,

As the organization serving inner North and Northeast Portland neighborhoods, the Northeast Coalition of Neighborhoods (NECN), writes this letter to comment on the Environmental Protection Agency's (EPA) proposed cleanup plan of the Portland Harbor Superfund Site. The proposal, Alternative I, does not go far enough to protect human health and the environment. We need a more aggressive plan, such as Alternative G, that adequately addresses the harm to the Portland Harbor over the last century. We make the following requests of the EPA:

**Lift the fish consumption advisory warning for all people.** The EPA's plan should result in a lift of the fish advisory warning within a 10-20 year period. Resident fish should be clean, healthy, and safe to eat. The greatest risk from the river is to the people and wildlife that eat the resident fish. Right now, it is not safe for a healthy, adult person to eat more than eight ounces of resident fish per month from the contaminated site. For pregnant or nursing women, no amount of resident fish is safe. The contaminants also harm local wildlife such as bald eagles, osprey, otter, and fish by causing mortality, reproductive, and developmental problems.

**Rely less on "monitored natural recovery".** The proposal leaves about 85% of the site to "monitored natural recovery". The EPA should dredge and remove at least 1,000 acres of polluted sediment from the river. Dredging should occur in areas of high human use and high ecological value. The proposed strategy leaves the river contaminated for generations to come.

**Take toxic dredged sediments to an appropriate landfill.** Confined disposal facilities and capping of dredged sediment are problematic. The EPA should remove contaminants from the river, not simply stored in or next to the river. It takes hundreds to thousands of years for substances to degrade. During that time, toxics can build up in the ecosystem and eventually be released into the Columbia River and ocean. Conditions of climate change, tectonic activity, and flooding increase likelihood of exposure.



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**Hold responsible parties accountable for creating a safer Portland Harbor.** Entities with liability for the pollution should pay for a comprehensive cleanup. Responsible parties include some of the biggest industries in Oregon and the world. While some industries complain this will hurt the economy, EcoNorthwest did a study, which determined that every dollar spent on the cleanup of the river generates more than one dollar of economic activity. Costs should not be unfairly shifted to ratepayers or to residential property taxes.

**Include the Yakama Nation and all local tribal entities of interest in the proposal.** Language regarding the Yakama Nation and all local tribes of interest should be included in the plan, to reflect their role. Tribes should be fully engaged and active participants in the Portland Harbor cleanup.

Alternative G will better protect the health of our communities, our environment and our wildlife. On behalf of all people in inner North and Northeast Portland who rely on the river for food, recreation, employment and culture, we urge the EPA to implement a plan that is not for industry but for people. Thank you for considering NECN's requests.

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